

**REMARKS**

Claims 1-5, and 11-31 are pending in this application. By this Amendment, claims 1, 2, 11, 15, 20-22, and 24-25 are amended and claims 26-31 are added. Support for new claims 26-31 can be found in the specification including the original claims and the figures, for example, see Figure 2. Reconsideration in view of the above amendments and following remarks is respectfully requested.

Applicant respectfully requests a personal interview with the Examiner prior to a First Office Action in order to expedite prosecution. Additionally, Applicant incorporates all previous amendments and arguments in their entirety herein.

**I. 35 U.S.C. §102(e)****A. Farrenkopf**

The Office Action rejects claims 1-4, 13-18, 21-22, and 24-25 under 35 U.S.C. §102(e) over Farrenkopf. Since Farrenkopf fails to disclose or suggest all the features of the claims, the rejection is respectfully traversed.

The Advisory Action dated March 7, 2003 stated that with regards to the interface between a well and a substrate, it seems that Applicant has overlooked the inconsistency of the claimed invention. While the Applicant respectfully disagrees with the Advisory Action, Applicant submits that claim 1 has been amended to clarify this issue. If further Amendments are believed beneficial, the Examiner is invited to contact Applicant's representative.

Further, the Advisory Action states that with regards to the limitation that the heavily doped region is separated from the contact region, Applicant should note that nowhere in the claims such a limitation is included. Applicant respectfully submits that claim 11, 20, 21, and new claim 30 recite the buried layer being separated from the contact regions.

For at least the reasons set forth above, Applicant respectfully submits that claims 1, 15, and 24 are allowable. Claims 2-4, and 13-14 depend from claim 1, and claims 16-18, 21-22, and 25 depend from claim 15, and are allowable for at least the same reasons, as well as their added features and the combinations thereof. Withdrawal of the rejection is respectfully requested.

B. Wong

The Office Action rejects claims 1-2, 4-5, and 11-25 under 35 U.S.C. §102(e) over Wong. Since Wong fails to disclose or suggest all the features of the claims, the rejection is respectfully traversed.

The Advisory Action states that with regards to the Applicant's arguments that the doped region of Wong is not a buried region, Applicant is advised that during patent examination, the pending claims must be given the broadest reasonable interpretation consistent with the specification. However, although Applicant respectfully disagrees with the statement that the doped region of Wong is in fact a buried layer, Applicant submits that with respect to claim 1, the doped region of Wong is not located between a first contact region and a first well and a surface of the first well opposite from the first contact region within the semiconductor substrate.

Further, with respect to claim 15, Applicant respectfully submits that Wong's doped layer does not correspond with at least the feature of a heavily doped region of buried layer having a second conductivity type not formed at an interface between the first and second wells, wherein the buried layer is within the semiconductor substrate separated from any surfaces of the semiconductor substrate.

Finally, with respect to claim 24, Applicant respectfully submits that Wong's doped layer does not correspond to the heavily doped region of buried layer, which includes at least a feature of a heavily doped region of buried layer having the second conductivity type formed between the first contact region in the first well and an outer surface the first well within the semiconductor substrate and not formed at an interface between the first and second wells, and a heavily doped region of buried layer having the first conductivity type formed between the second contact region in the second well and an outer surface the second well within the semiconductor substrate.

For at least the reasons set forth above, Applicant respectfully submits that claims 1, 15, and 24 are allowable. Claims 2, 4-5, and 11-14 depend from claim 1, and claims 16-23, and 25 depend from claim 15, and are allowable for at least the same reasons, as well as their added features and the combinations thereof. Withdrawal of the rejection is respectfully requested.

**II. 35 U.S.C. §102(b)**

The Office Action rejects claims 1-2, 1`2, 15-16, and 21-24 under 35 U.S.C. §102(b) over Zunino. Since Zunino fails to disclose or suggest all the features of the claims, the rejection is respectfully traversed.

In addition to all of the arguments set forth in the Request for Reconsideration, the entirety of which is incorporated herein, Applicant respectfully submits that Zunino fails to disclose or suggest all the features of the claims. Additionally, for the reasons discussed above with respect to Farrenkopf and Wong, Applicant respectfully submits that Zunino fails to disclose or suggest all the features of the claims.

For at least the reasons set forth above, Applicant respectfully submits that claims 1, 15, and 24 are allowable. Claims 2 and 12 depend from claim 1, claims 16, 21, 22, and 23 depend from claim 15 and are allowable for at least the same reasons, as well as their added features and the combinations thereof. Withdrawal of the rejection is respectfully requested.

**III. New Claims 26-31**

By this Amendment, claims 26-31 are added to the application. Claims 26-31 broadly recite features of the preferred embodiment(s). It is respectfully submitted that the new claims are allowable over the references of record for at least the reasons discussed above in connection with claims 1-5 and 11-25.

### **CONCLUSION**

Applicant requests, as mentioned above, a personal interview prior to an action on the merits in order to expedite this application.

In view of the foregoing amendments and remarks, it is respectfully submitted that the application is in condition for allowance. If the Examiner believes that any additional changes would place the application in better condition for allowance, the Examiner is invited to contact the undersigned attorney, Laura L. Lee, at the telephone number listed below. Favorable consideration and prompt allowance are earnestly solicited.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this, concurrent and future replies, including extension of time fees, to Deposit Account 16-0607 and please credit any excess fees to such deposit account.

Respectfully submitted,  
FLASHER & KIM, LP



Daniel Y.J. Kim  
Registration No. 36,186  
Laura L. Lee  
Registration No. 48,752

P.O. Box 221200  
Chantilly, VA 20153-1200  
703 502-9440 INITIALS  
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